



HON. SYLVIA HINDS-RADIX
Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**
100 CHURCH STREET
NEW YORK, NY 10007

Laura C. Williams
Assistant Corporation Counsel
Labor & Employment Law Division
(212) 356-2435
lawwillia@law.nyc.gov

BY ECF

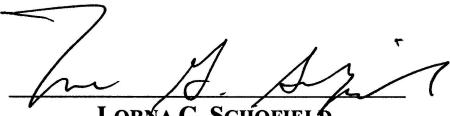
Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application **GRANTED**. By **September 7, 2022**, Defendants shall file the motion to dismiss with a memorandum of law, not to exceed twenty-five pages. By **September 28, 2022**, Plaintiffs shall file their opposition, not to exceed twenty-five pages. By **October 12, 2022**, Defendants shall file their reply, not to exceed ten pages. The parties shall comply with this Court's Individual Rules in filing the motion. The Clerk of Court is respectfully directed to reopen the case.

Dated: August 18, 2022

New York, New York

Re: Khairul Annam et al v. The City of New York et al
Docket No. 22-CV-02945 (LGS)



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I am an Assistant Corporation Counsel in the office of the Hon. Sylvia Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced action. I write in accordance with Your Honor's Individual Rule B(2) to request that Your Honor grant an extension of time, from August 19, 2022 to September 7, 2022, for defendants to file their motion to dismiss the Second Amended Complaint in this matter. The parties previously requested, and the Court granted, an amended briefing scheduling in light of the plaintiffs' decision to file the Second Amended Complaint on July 8, 2022. See ECF Dkt. No. 26. Plaintiffs' counsel consented in principle to defendants' request for an extension to file their motion. I have attempted to reach plaintiffs' counsel today by email and by phone regarding the specific date requested and the below proposed briefing schedule, but have not received a response at the time of filing.

This request is made because I have been attending to an urgent medical matter that has required, and will continue to require, my intermittent absence from the office.¹ The requested extension will allow this Office to complete defendants' motion in light of my anticipated absences over the next several weeks. Accordingly, Defendants respectfully request that their time to file their motion to dismiss be extended until September 7, 2022 and, in light of this request, that the briefing schedule for their motion be adjusted as follows:

- Defendants' Motion: September 7, 2022
- Plaintiffs' Opposition: September 28, 2022
- Defendants' Reply: October 12, 2022

¹ If needed, I can explain further to the Court in camera.

Defendants also note that this case was marked “closed” following their filing a stipulation pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure (ECF Dkt. No. 28), and clarify that the stipulation is intended to dismiss the defendants and causes of action eliminated with the filing of plaintiffs’ Second Amended Complaint, and not this action in general.

Respectfully submitted,

lsw

Laura C. Williams
Assistant Corporation Counsel

cc: Mustapha Ndanusa (via ECF)
Davis, Ndanusa, Ikhlas & Saleem LLP
Attorneys for Plaintiffs
26 Court Street
Suite 603
Brooklyn, NY 11242
(718) 783-6819